

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: DIGITEK PRODUCTS
LIABILITY LITIGATION

MDL Docket No. MDL 1968
2:08-md-01968
HONORABLE JOSEPH R. GOODWIN

APPLICATION OF STANLEY G. JACKSON FOR APPOINTMENT
TO THE PLAINTIFF'S STEERING COMMITTEE

NOW COMES, Stanley G. Jackson and hereby applies for Plaintiff's Steering Committee and respectfully shows in support thereof the following:

I. Willingness and availability to commit to a time consuming project

Stanley G. Jackson, founder of Jackson Law Offices, P.C., is willing and available to commit the time and effort necessary to this complex case. Stanley G. Jackson has for the last thirty-five (35) years specialized in complex litigation, and thus is aware of the time necessary to effectively pursue a case of this magnitude. Stanley G. Jackson is a private pilot with his own plane. As a consequence he can be in Charleston, West Virginia at a flight time of approximately 1.5 hours and in New Jersey in approximately 3.5 hours.

II. Ability to cooperate with others

Stanley G. Jackson and Jackson Law Offices, P.C. was employed by the Trustee in Bankruptcy in the Carolina Investors/HomeGold litigation. The Carolina Investors/HomeGold litigation was comparable in South Carolina to the Enron litigation. It involved approximately fifty (50) defense attorneys and seven (7) Plaintiff law firms. It was one of the largest financial debacles in the history of the state of South Carolina. Mr. Jackson was one of the lead counsel; and therefore, had to effectively coordinate with the other attorneys. Stanley G. Jackson's cooperative work with the other Plaintiffs' counsel resulted in a very successful conclusion of

that case for \$42 million. Recently Mr. Jackson was associated in a case pending in the Virgin Islands Federal Court involving multiple Plaintiff and Defense Counsel which settled for \$30 million. Additionally, Jackson Law Offices, P.C. was part of the informal discovery committee in the antitrust case of *In Re Vitamin* which involved 67 Plaintiff's law firms. The case settled for \$1.13 billion. Also, in the Graniteville train litigation when chlorine gas maimed, killed and dispossessed approximately 5400 people, Mr. Jackson had a sealed favorable settlement. This case also involved being able to work with multiple Plaintiffs' lawyers in coordinating the discovery and expert witnesses in the case.

III. Professional experience in this type of litigation.

Stanley G. Jackson obtained his Bachelor's degree from Vanderbilt University in 1969, attended Columbia University Graduate School of Business in New York City, in 1970 and received a Juris Doctor's degree from University of Georgia School of Law in 1973. Mr. Jackson is A.V. rated by Martindale-Hubble. He has litigated in Federal Court product liability cases through a jury trial. Additionally, Stanley G. Jackson is qualified to manage complex class action litigations as shown by the attached affidavits of two (2) superior court judges, a former president of the State Bar of Georgia, and the former president of the Trial Lawyers Association. Since many of the consolidated cases have been brought as class actions, Mr. Jackson's expertise in class action litigation would be especially beneficial to the Plaintiff's Steering Committee. More information concerning Jackson Law Offices, P.C. is available at the firm website www.stanjackson.com.

IV. Other relevant considerations.

Stanley G. Jackson has been an adjunct law professor at the Charleston School of Law, and a visiting professor of litigation at the Maribor School of Law in Maribor, Slovenija Europe.

In the state of Georgia, the state of Georgia has an interest in punitive damages that are awarded in this case. Under the Georgia Punitive Damage Statute, O.C.G.A. § 51-12-5.1, seventy five (75%) of the punitive damages arising out of a products liability defects in the state of Georgia goes to the state. As far as the undersigned discerns, Jackson Law Offices, P.C. was the first to file a suit in Georgia concerning Digitek Products and their manufacturers' liability. Consequently, Jackson Law Offices, P.C. should be placed on the Steering Committee to protect the interests of the State of Georgia in a punitive damages award.

Respectfully submitted,

s/Stanley G. Jackson
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